## MEMO2ENDORSED Document 64

THE

DASCARELLA

Filed 11/08/24

Page 1 of 2

USDC SDNY DOCUMENT

ELECTRONICALLY FILED

DOC#:

11/8/24

☐Suffolk Office: 775 PARK AVENUE SUITE 255 **HUNTINGTON, NY 11743** Telephone: (631) 789-FIRM (3476) Facsimile: (631) 667-8727

DATE FILED:

E-MAIL:PASCARELLAW@OPTONLINE.NET

James A. Pascarella James Adam Pascarella

☐ Nassau Office:

MINEOLA, NY 11501 Telephone: (516) 741-FIRM (3476)

(516) 742-1134 Facsimile: (516) 742-1137

1551 FRANKLIN AVENUE

Of Counsel Norman Sarnoff Thomas A. Illmensee

November 8, 2024

## Via ECF

Honorable Andrew L. Carter, Jr. United States District Court Judge Southern District of New York 40 Foley Square New York, New York 10007

> Re: United States v. James Sorce S1 22 Cr. 642 (ALC)

Dear Judge Carter:

I represent the above-named defendant. The within request for an adjournment is made with the consent of the government, through AUSA Matthew R. Shahabian.

Presently, this case is on the Court's calendar for a status conference on November 14, 2024. Mr. Shahabian and I are close to coming to a resolution of the case. However, additional time is needed to address certain outstanding matters.

Therefore, it is respectfully requested that this case be adjourned to January 9, 7, 14, 2025, or to a date in January that is amenable to the Court's calendar. The defendant consents to an exclusion of time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), between November 14, 2024 and any rescheduled conference date. An exclusion is in the interest of justice because it will allow the parties to continue to work out and complete a disposition of the case. A joint motion for adjournment of an earlier-scheduled conference previously was submitted by the Government and was granted by the Court.

Thank you for your attention to this matter.



Respectfully submitted,

/s/

JAMES ADAM PASCARELLA (JP1496)

CC.:
To all parties via ECF

The application is **GRANTED**. The status conference is adjourned to 1/14/25 at 12:00 p.m. Time excluded from 11/14/24 to 1/14/25 in the interest of justice. So Ordered.

Ansha 7 Cat 2